

1 Sarah Ferguson (NSBN 14515)
Parsons Behle & Latimer
2 50 W. Liberty Street, Suite 750
Reno, Nevada 89501
3 Telephone: (775) 323-1601
sferguson@parsonsbehle.com
4

*Attorney for Defendants Jerritt Canyon Gold LLC
and FM US Holdings Limited*

6 IN THE UNITED STATES DISTRICT COURT

7 FOR THE DISTRICT OF NEVADA

8 NICANDRO ROSALES, Individually and
On Behalf of Others Similarly Situated,

9 Plaintiff,

10 vs.

11 JERRITT CANYON GOLD LLC and FM
12 US HOLDINGS LIMITED,

13 Defendants.
14

Case No. 2:25-cv-00269-GMN-MDC

**STIPULATION AND ~~Proposed~~ ORDER TO
EXTEND DEADLINE FOR DEFENDANTS
TO FILE RESPONSIVE PLEADING TO
COMPLAINT**

(First Request)

15 Plaintiff Nicandro Rosales (“Plaintiff”) and Defendants Jerritt Canyon Gold LLC and FM
16 US Holdings Limited (“Defendants” and, together with Plaintiff, the “Parties”), by and through
17 their undersigned counsels of record, hereby agree and stipulate to extend the deadline for
18 Defendants to file a responsive pleading to Plaintiff’s Complaint on file herein to and including
19 April 22, 2025. During the stipulated extension, the Putative Class Members will not be prejudiced.
20 The Parties agree that the statute of limitations under the Fair Labor Standards Act will be tolled
21 for the Putative Class Members, as defined in the Complaint, from the date of the filing of this
22 extension through April 22, 2025. Nothing herein constitutes an admission by Defendants regarding
23 the defined class, if any, nor does the tolling apply to the statute of limitations for the underlying
24 claims in the Complaint.

25 This is the first request by Defendants for an extension of this deadline. This Stipulation is
26 made in good faith and not for the purposes of delay, but rather to allow the Parties to engage in

27 ///

28 ///

1 settlement negotiations to attempt to resolve all claims and conserve resources during said
2 negotiations.

3 Dated: March 10, 2025.

Dated: March 10, 2025.

4 RODRIGUEZ LAW OFFICES, P.C.

PARSONS BEHLE & LATIMER

5 /s/ Esther C. Rodriguez

6 Esther C. Rodriguez (NSBN 006473)
7 10161 Park Run Drive, Suite 150
8 Las Vegas, NV 89145
9 Telephone: (702) 320-8400
10 info@rodriguezlaw.com

11 -and-

12 Michael A. Josephson, TX Bar No. 24014780*
13 Andrew W. Dunlap, TX Bar No. 24078444*
14 Josephson Dunlap LLP
15 11 Greenway Plaza, Suite 3050
16 Houston, TX 77046
17 Telephone: (713) 352-1100
18 mjosephson@mybackwages.com
19 adunlap@mybackwages.com

20 -and-

21 Richard J. (Rex) Burch, TX Bar No. 24001807*
22 Bruckner Burch PLLC
23 11 Greenway Plaza, Suite 3025
24 Houston, TX 77046
25 Telephone: (713) 877-8788
26 rburch@brucknerburch.com

27 *Attorneys for Plaintiff*

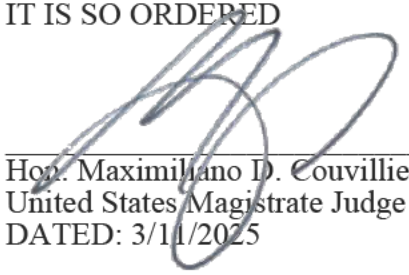
28 * *Pro Hac Vice Applications Pending*

/s/ Sarah Ferguson

Sarah Ferguson (NSBN 14515)
50 W. Liberty Street, Suite 750
Reno, NV 89501
Telephone: (775) 323-1601
sferguson@parsonsbehle.com

Attorney for Defendants

IT IS SO ORDERED



Hon. Maximiliano D. Couvillier III
United States Magistrate Judge
DATED: 3/11/2025